

Questions and Answers Regarding National Standards for Organic Agriculture

The Canadian Food Inspection Agency, in partnership with the Organic Federation of Canada, has developed the Organic Standards Interpretation Committee (SIC).

The objective of the Committee is to provide, to the Canada Organic Office, interpretive guidance on issues related to the National Standards for Organic Agriculture (CAN/CGSB 32.310 and CAN/CGSB32.311).



Below are proposed answers to questions, raised by organic stakeholders, regarding the National Standards for Organic Agriculture. The proposed responses are subject to a 30 day comment period. All comments regarding these answers should be sent to OPR.RPB@inspection.gc.ca

Comment period – July 4th to August 4th 2016

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Crop production

Isolation distances

How should the note in 5.2.2 on isolation distances for preventing GE contamination be used in the enforcement of 5.2.2 d)? (282)

Isolation distances are one of many strategies that could be used to minimize contamination risk. Shorter distances other than those provided in the 5.2.2 Note may prove to be as effective depending on wind direction, topography, vegetation etc. Other mitigation strategies such as delayed planting, border rows, etc., could also be effective on their own, or in combination with other tactics. It is critical to understand that Notes and examples in the standard are not themselves enforceable, and are used to give insight or direction on how to implement the standard.

Alfalfa seed production

Does the note in 5.2.2 d), "(for seed production)", refer to the organic alfalfa or to the GE alfalfa? (282A)

Organic alfalfa seed fields should be 3km from ALL GE alfalfa fields (i.e. both GE seed production fields and GE hay fields)

Livestock Production

Parallel production

Is parallel production in livestock prohibited? If so under what circumstances might it be allowed? (283)

Within an operation, there is no prohibition on parallel production of livestock as long as all components of organic and non-organic livestock production (animals and inputs such as feed, cleaning products, etc.) are clearly segregated or distinguishable from one another, and livestock products are not commingled. Keeping organic and non-organic livestock in separate production units (see 3.56 in 32.310) is preferable.

Nutritional requirements – early lactation

6.4.3 g) allows for increased grain feeding during uncommonly cold conditions or when forage quality is compromised to ensure that nutritional requirements of ruminants are met. Can dairy cows be fed more than 40% grain in early lactation when their energy requirements are highest? (295)

No, dairy cows cannot be fed more than 40% grain to meet their nutritional needs in early lactation. The allowance for feeding more grain in 6.4.3 g) is in exceptional circumstances beyond the control of the operator.

Use of non-organic feed

Under what circumstances can a dairy operation use non organic feed? (260)

1. Catastrophic event: Following a catastrophic event that directly affects the operation, a dairy herd may be provided non-organic feed for a maximum of ten consecutive days, as specified in 6.4.7 a. In this case there is no interruption of the production of organic milk and all animals retain organic status for sale as meat.
2. During a regional organic feed shortage, organic dairy herds must be provided a 100% organic ration for their milk to retain its organic status. In other words, milk from dairy cows provided non-

organic feed as a result of a regional organic feed shortage loses its organic status. For milk from these cows to regain organic status:

- a) these cows must have been provided a minimum of 80% organic feed during the regional organic feed shortage; and
- b) a three-month transition period in which these cows have been fed 100% organic feed must be completed.

3. Dairy herds in transition to organic production may be provided non-organic feed, in accordance with the rules in 6.3.1 a) and b), which allow cows to be fed for 9 months with a minimum of 80% organic feed ration, followed by 3 months of 100% organic feed. Transitional feed in the last year of transition, produced on a farm transitioning its whole dairy herd to organic production, may be considered to be organic on the same farm. (32.310-6.3.3)

GE vaccines

Can GE vaccines be used in poultry if the conditions for the use of veterinary drugs (6.6.10) are met? (298)

Vaccines that are products of genetic engineering, as defined in clause 3.27 of 32.310, cannot be used. For example, a vaccine derived from a GE biological entity (virus, bacteria...) may not be used even if there is no commercially available alternative. Vaccines grown on GE substrate may be used if no alternative is commercially available and that no traces of the GE substrate exist in the final product (32.311 - 5.1.2).

Spray bandage

Is a spray bandage, sprayed on wounds, replacing traditional bandages, allowed? (292)

A spray bandage, containing ingredients not listed in 32.311, would fall into the category of "prescribed veterinary drugs" (6.6.10 c) and could be used if products permitted by the Standard "are ineffective in combatting illness or injury". Withdrawal period specified in 6.6.10 d) applies, as well as the special provision for poultry and breeding stock in 6.6.12.

Sprouts, shoots and microgreens production

Plants sold in pots

Plants harvested within 30 days of planting fall under clause 7.4 and require the use of organic seed. What if they are sold in pots to a customer who keeps them beyond the 30 days? Would they still need to be grown from organic seed? (293)

If the plants are not "generally harvested within 30 days of imbibition" they do not fall under 7.4 (shoots and microgreens) and the organic requirements in 5.3 a) apply.

Greenhouse crops

Parallel production

Is parallel production prohibited for greenhouse crops? (285)

The Standard prohibits parallel production in annual crops including those grown in greenhouses. However, if visually distinguishable organic and non-organic crops are grown, this is considered to be split production (5.1.3), which is permitted if: the systems (air, water, pest control, etc.) are segregated; and there is no risk of contamination of the organic crop by prohibited substances (1.4).

Table 4.3 – Crop production aids and materials

GMO free formulants

Must formulants listed on PMRA 4A and 4B tables be GMO free? (281)

As with all substances used in organic production, 'formulants' (Table 4.3) for pesticides must adhere to GE requirements as outlined in 4.1.3 of 32.311.

Magnesium lignosulphate

Is Magnesium lignosulphate allowed under the listing of lignin sulphonates in Table 4.3 of the Permitted Substances List? (289)

No. Lignin sulphonates are allowed as chelating agents for micronutrients, formulant ingredients or dust suppressants only. Magnesium lignosulphate is not appropriate for any of these prescribed uses.

Processes - biobased biodegradable mulches

For a biobased biodegradable mulch, what are the acceptable processes in the manufacturing of the film? Could a biobased film become non-compliant because of the manufacturing process that would disqualify it from being used on organic farms? (284)

Only mechanical and physical processes are acceptable as outlined in the synthetic definition - 3.65. Even when the ingredients are biobased, chemical processes that result in a synthetic product would render the final product non-compliant. Refer to 1.4 f).